

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**HOME CARE HOSPICE, et al.**

**Defendants.**

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**No. 08-CV-4711**

**The Honorable Legrome D. Davis**

**STIPULATED ORDER FOR RELEASE OF FUNDS**

WHEREAS, on November 12, 2008, the Court issued a Stipulated Restraining Order (“SRO”) (Doc. 14), enjoining Alex Pugman and Svetlana Ganetsky (collectively, “Defendants”) from transferring or otherwise disposing of certain assets in various bank and/or investment accounts owned or controlled (individually or jointly) by the Defendants, as set forth in Exhibit A to the SRO; and

WHEREAS, during the 2011 tax year, certain of these accounts earned and accrued taxable income (including interest, dividends, and capital gains) not paid to Defendants and resulted in a tax liability of \$24,739.88; and

WHEREAS, Defendants paid \$24,739.88 to the federal and state government for the tax owed on these accounts; and

WHEREAS, the parties have reached an agreement providing for the reimbursement of Defendants of the taxes paid upon these certain accounts through the release of \$24,739.88 pursuant to the terms set forth below.

Accordingly, it is AGREED between Plaintiff, the United States of America, and Defendants that:

1. As set forth in Exhibit A, which is attached hereto, certain accounts subject to the SRO that are owned or controlled (individually or jointly) by the Defendants earned and accrued taxable income in the 2011 tax year. This income resulted in a tax liability of \$24,739.88 consisting of \$ 22,556.65 in federal tax and \$ 2,183.23 in state tax.

2. Defendants paid \$ 24,739.88 in total to the federal and state governments for the tax owed on the accounts identified in Exhibit A.

3. The sum of \$ 24,739.88 shall be immediately released from Merrill Lynch (Account No. [REDACTED]) and transferred to the unrestricted bank account jointly held by Defendants with TD Bank (Account No. [REDACTED]).

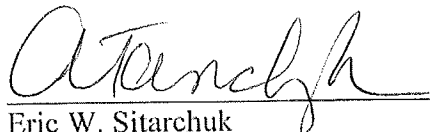
4. The United States shall forthwith notify Merrill Lynch of this Stipulated Order for Release of Funds and arrange for the transfer of said funds.



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Date: 5/11/12



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*Attorneys for Defendants Alex Pugman and  
Svetlana Ganetsky*

Date: 5/11/12

SO ORDERED:

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Davis, J.

Date: \_\_\_\_\_